UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
UNITED STATES OF AMERICA,	X :	
- V	:	15 Cr. 643 (PKC)
JASON GALANIS, JOHN GALANIS, a/k/a "Yanni,"	:	
JARED GALANIS, GARY HIRST, and	:	
DEREK GALANIS,	:	
Defendants.	: X	

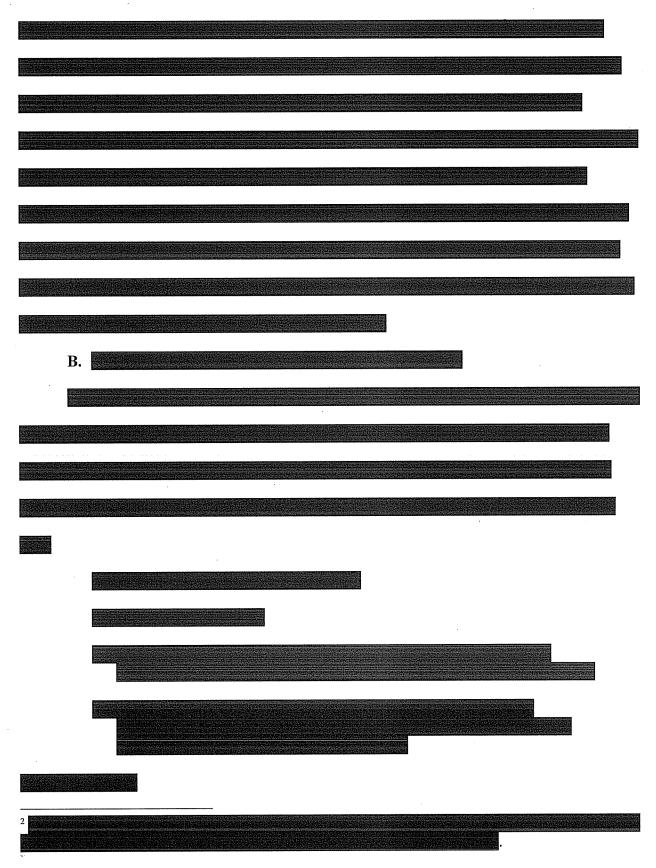
GOVERNMENT'S REPLY MEMORANDUM OF LAW IN SUPPORT OF ITS MOTIONS IN LIMINE

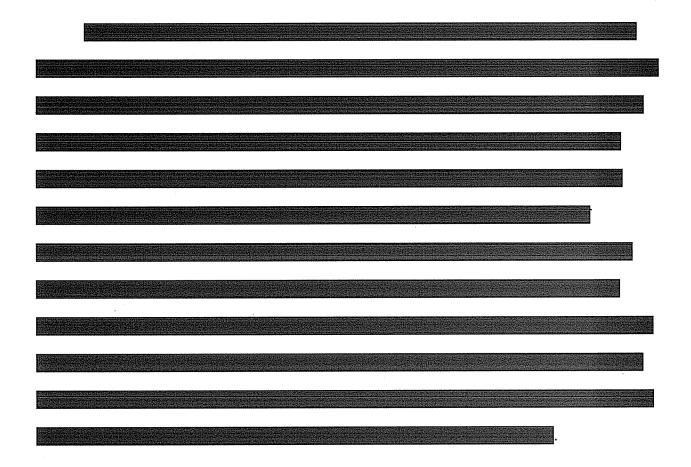
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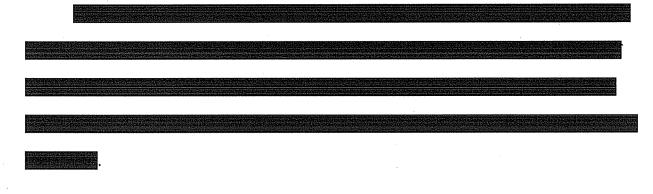
In response to the Government's motion in limine, Jason Galanis ("Galanis" or "the
defendant") fails to articulate a valid legal basis that would justify precluding admission at trial
of
Accordingly, the
Government respectfully requests that the Court grant the Government's motion in limine in its
entirety.
ARGUMENT
I. The Defendant Fails to Articulate a Valid Basis to Preclude Admission of

¹ Galanis indicates that he does not, at this time, oppose the Government's motion for admission of evidence of the Securities and Exchange Commission ("SEC") bar prohibiting Jason Galanis from serving as an officer and director of a public company for a five year-period as direct evidence of the crimes charged in the Indictment. *See* Def. Br. at 1 n.2.





CONCLUSION



Dated: June 30, 2016

New York, New York

Respectfully submitted,

PREET BHARARA United States Attorneys

By: <u>/s/</u>

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